A.2
3/14/96

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

March 14, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
AND HAND DELIVERY

SR-6J

Mr. Ronald Frehner
Project Coordinator - ACS NPL Site
Conestoga-Rovers & Associates
1801 Old Highway 8, Suite 114
St. Paul, Minnesota 55112

RE: Approval with Modifications of Revised (Second Draft) Perimeter Groundwater Containment System RD/RA Work Plan and Effluent Limitations, American Chemical Services, Inc., Griffith, Indiana

Dear Mr. Frehner:

The United States Environmental Protection Agency (U.S. EPA), and the Indiana Department of Environmental Management (IDEM), have reviewed the Revised (Second Draft) Perimeter Groundwater Containment System (PGCS) RD/RA Work Plan dated August 1995, for the American Chemical Services, Inc., National Priorities List (NPL) Superfund Site located in Griffith, Indiana (ACS Site). U.S. EPA hereby approves with modifications the revised PGCS RD/RA Work Plan. The modifications, along with general comments, are included as Enclosure 1 to this letter.

The Work Plan was submitted by Montgomery Watson on behalf of the respondents to the Unilateral Order (UAO) (Docket No. V-W-95-C-260) which was issued by U.S. EPA on September 30, 1994.

Pursuant to paragraph 32 of the UAO, within twenty-one (21) days of the date of EPA's written notification of approval with modifications or disapproval of a Work Plan, Respondents shall submit an amended Work Plan. Hence, within 21 days of receipt of this letter, Respondents must submit an amended Work Plan which incorporates the enclosed modifications. Furthermore, as is indicated in the enclosed modifications, the 50% PDCS design submittal must be submitted within 21 days of receipt of this letter.

This letter also addresses 1) whether a permit will be required for the proposed effluent discharge of groundwater to the wetlands from the treatment system to be installed at the ACS Site, and 2) what the appropriate effluent limitations for the proposed discharge of groundwater from the treatment system to the wetlands are.

First, IDEM who has primary responsibility with regards to permit issuance in these matters has determined that no permit would be required for the proposed effluent discharge.

Next, regarding effluent limitations, IDEM's Office of Water Management Section performed a review based on the ACS site information and developed National Pollutant Discharge Elimination System (NPDES) limitations. Even when no permit is required, a facility undergoing Superfund remediation must meet the relevant substantive requirements. Hence, the NPDES limitations developed by IDEM are relevant and appropriate (i.e., ARARs) to the effluent at the ACS Site, and the effluent discharge into the wetlands from the proposed groundwater treatment system must be in compliance with those NPDES limitations. As you know, draft limitations were previously provided to Respondents for discussion purposes. Respondents provided additional information and IDEM made several adjustments to the draft limitations. U.S. EPA hereby provides to you the enclosed final effluent limitations (Enclosure 2). The limitations are based upon a zero flow scenario since the treatment system will be discharging into the wetlands.

IDEM must also be consulted on the issue of whether an air permit is required for the treatment system. I encourage you to follow-up with the appropriate officials at IDEM. Also, follow-up with the U.S. Army Corps or Engineers with respect to the permit for the discharge of dredged/fill materials.

Finally, as the PGCS Work Plan mentions, one of the benefits of the design-build approach, is that it will serve to fast track the design process. For example, no preliminary design document will be submitted for agency review. As you know, to further expedite the process U.S. EPA has already given approval to Respondents to order the treatment building one of the long lead-time items (Enclosure 3). However, in this regard, to be clear, U.S. EPA will not take on a major oversight role in reviewing the design of the system; hence, Respondents are taking additional risk that the system will meet the effluent limitations that appropriate and permits are applied for and complied with.

If you have any questions, or require clarification, you may reach me at (312) 886-4745.

Sincerely,

Sheri L. Bianchin,
Remedial Project Manager
Office of Superfund
Remedial Response Section #3

Enclosures

cc: Joseph Adams, Montgomery Watson
Ron Schlicher, Montgomery Watson
Peter Vagt, Montgomery Watson
Steve Rauch, IDEM
George Oliver, IDEM
Holly Grejda, IDEM
Felicia George, IDEM
Steve Mrvicka, Black & Veatch
Rob Lantz, Black & Veatch
Matt Mastronardi, Black & Veatch
Peter Howe, U.S. EPA
Mike McClary, U.S. EPA, ORC
Jim Chapman, U.S. EPA, OSF, TSS
Steve Mangion, U.S. EPA, HQ
Robert Tucker, U.S. Army Corps of Engineers

ENCLOSURE 1

Review Comments on
Responses to U.S. EPA Comments on the
Revised Perimeter Groundwater Containment System (PGCS) RD/RA
Work Plan and Modifications to the PGCS RD/RA Work Plan
American Chemical Services, Inc.
Griffith, Indiana

General Comments

1. During review of the Revised Preliminary Groundwater Containment System (PGCS) Work Plan, it was noted that a large number of the U.S. EPA's comments were not adequately addressed (i.e., Comments 1, 2, 5, 6, 8, 9, 36, and 37), or the need to address the U.S. EPA's comments were deemed "more appropriately addressed" in other documents (i.e., Comments 32, 38, 39, and 40). Therefore, it appears that the Responses to U.S. EPA Comments on the Revised Perimeter Groundwater Containment System (PGCS) RD/RA Work Plan is incomplete. Go back through EPA's original comments and address above-mentioned comments.

2. Throughout the document, the word "shall" used in the SOW has been changed to the word "will" in the Work Plan. Instances where this change has occurred must be revised so that the text of the Work Plan conforms to the SOW.

3. Comment Response #3.

Although U.S. EPA issued preliminary comments regarding the placement of the groundwater extraction trench, U.S. EPA reserves final judgement until the review of the design.

4. Comment Response #5.

Although the pump test has been completed for the design of the PGCS, the pump test SOP still needs to appear in the QAPP. Pump tests will be performed in other portions of the site in the upper aquifer, as well as in the lower aquifer. Therefore, include the pump test SOP in the QAPP.

5. Comment Response #6.

The U.S. EPA's comment directed the PRPs/UAO Repsondents to highlight any departures from the ROD stating that "the U.S. EPA should not be put in the position of constantly reviewing documents to see if previously stated requirements are adhered to." The PRPs response to this comment was to state that "where inconsistencies have been identified (by the U.S. EPA and IDEM), revisions will be made." This response is unacceptable to the U.S. EPA and IDEM. Therefore, revise Section 1 of the Work Plan

to state the following: "Unless specific written authorization was provided by the U.S. EPA, all matters associated with the work set forth in the Pre-design Work Plan shall conform to the UAO, SOW and ROD. Any deviation from the UAO, SOW and ROD, without specific written authorization by the U.S. EPA, shall be considered null and void."

6. Comment Response #10.

The extent of groundwater contamination must be determined through sampling and analysis performed in accordance with an approved QAPP. The PRPs/UAO Respondents theories and conjectures regarding past hydrogeologic and environmental circumstances do not alleviate themselves of the burden of establishing, through sampling and analysis, the extent of all groundwater contamination especially that found in excess of the established performance standards.

7. Comment Response #30.

The map defining the six to ten sampling locations at each of the two source/waste areas, is not included in the Revised PGCS Work Plan. This map must be included in future revisions of the PGCS Work Plan.

8. Comment Response #30:

The response states that a map with the source/waste area sample locations is provided in the Work Pan. This map could not be located in the document, and needs to be provided.

9. Comment Response #55.

This states that ". . . the well and piezometer have been installed as approved by U.S. EPA and IDEM and so changes to the screen location cannot be made." It is important to note that IDEM does not have approval authority on this project as IDEM is in the support agency role. Nonetheless, when the pump test results are reviewed, potential impacts due to the selected screen locations will be evaluated.

10. Comment Response #59.

If the pump test was conducted in March 1995, and the sampling of groundwater was conducted in accordance with the PGCS Work Plan, then the analytical data associated with this work should be available. The U.S. EPA formally requests that this data be transmitted immediately.

Specific Comments

11. Page 1, Executive Summary, first paragraph, lines 9 and 10.

The purpose of the PGCS, as presented on page 1-1, should be revised. Revise the sentence to read as follows: The purpose of the perimeter groundwater containment system is to prevent **further** migration of contaminants in the **upper aquifer** groundwater from a **portion** the ACS site to adjacent properties. This is more accurate since the purpose of the PGCS is limited and will only serve to halt the continued migration of contaminated groundwater from the Still Bottoms/Treatment Lagoon area and the Onsite Containment area to adjacent properties.

12. Executive Summary, third paragraph. Revise the bullet item to read:

To the extent possible and reasonable, Agency assistance will be utilized in obtaining approvals/permits.

13. Page 1-1, first paragraph.

Revise the sentence to read as follows: The purpose of the perimeter groundwater containment system (PGCS) is to prevent **further** migration of contaminants in the **upper aquifer** groundwater from a **portion** the ACS site to adjacent properties. The PGCS is not intended to remediate the full extent of groundwater contamination.

14. Page 1-2, Purpose, first full paragraph.

Revise the sentence to read as follows: The purpose of the perimeter groundwater containment system is to prevent **further off-site** migration of contaminants in the **upper aquifer** groundwater from a **portion** the ACS site to adjacent properties.

15. Page 1-2 and 1-3, Purpose.

The document states that the installation of the PGCS will immediately prevent migration of contaminants off-site through water. However, this is overstating what the PGCS will achieve since the system will not "completely" address the requirement of the Record of Decision to reduce migration of contaminants off-site through water . . . As was previously mentioned, the PGCS is not intended to remediate the full extent of groundwater contamination. Revise the statement accordingly.

16. Page 1-3, Purpose, second paragraph, lines 8-10.

The barrier walls will not provide additional control of vertical groundwater contaminant migration in the Off-Site Containment area, as stated in the text. This control is mostly a function of the underlying clay materials. Contamination can be transported through the underlying clay layer, and contaminate the lower aquifer. This is a particular concern if wastes were disposed in trenches which were dug into or through the clay

layer. Therefore, the relevant portions of the text should be revised.

17. Page 1-3, Purpose, second paragraph, line 17-18.

The text states, "[f]urther, the landfill leachate is not the remedial responsibility of the ACS PRPs." This statement is inconsistent with the ROD and SOW. According to page 5 of the SOW, "[t]he Respondents shall design, construct, operate and maintain a groundwater extraction and treatment system to restore groundwater to performance standards." Therefore, as specified in the UAO, SOW, and ROD, the PRPs are responsible to collect and treat all groundwater determined to be in excess of performance standards. Therefore, delete the last two sentences.

18. Page 1-4, Design of a Flexible Treatment System.

Describe further why the treatment system is considered a flexible treatment system.

19. Page 1-6, Purpose, first paragraph, lines 1-3.

The text should be revised to state the following: "[a]lthough an NPDES permit will not be obtained, the ACS PRPs/UAO Respondents must assure that the effluent complies with all substantive requirements of an NPDES permit. As you know, this typically will require the submission of an NPDES application for IDEM review, prior to the establishment of site-specific effluent standards. Enclosure 2 to this letter provides the relevant and appropriate effluent limitations. Add this information to the PGCS Work Plan.

20. Page 1-5. Approval/Permits Assistance.

Strike the last bullet as it is vague and adds little to the discussion.

21. Page 1-5. Approval/Permits Assistance.

Strike the last sentence from the page as it is too preliminary to determine that no permits will be needed for on-site activities.

22. Page 2-2, Permitting, last sentence.

Rewrite the text as follows: To the extent possible and reasonable, U.S EPA and IDEM . . . will be utilized to further expedite the process.

23. Page 2-2, Design Workshop, first sentence.

Rewrite the text as follows: Several design workshops were held

and it is anticipated that additional design workshops will be . . .

24. Page 2-2, Design Workshop, first sentence.

Rewrite the text as follows: The workshops are utilized to discuss design scheduling . . .

25. Page 2-2, Design Workshop, second sentence.

Replace "workshop is" with "workshops are".

26. Page 2-3, 50% Design, General.

The 50% Design submittal does not address the following requirements of the preliminary and intermediate RD stated in the SOW: Draft Performance Standard Verification Plan, Draft QAPP, Draft HASP, Draft FSP and Draft Contingency Plan. Discuss that this a departure of the ROD and UAO SOW and why it is appropriate.

27. Page 2-4, 100% Design, General.

The 100% Design submittal does not address the following requirements of the prefinal and final design stated in the SOW: Final Performance Standard Verification Plan, Final Construction Quality Assurance Plan, Final QAPP, Final HASP, Final FSP and Final Contingency Plan. Discuss that this a departure of the ROD and UAO SOW and why it is appropriate. Also, submit a schedule showing when these will be finalized.

28. Page 2-4, 100% Design, 6th Bullet.

The SOW specifies that the Capital and Operation and Maintenance Cost Estimate will "[r]efine the FS cost estimate to reflect the detail presented in the Final Design." Revise the text such that this specification is included.

29. Page 3-1, Remedial Action, Paragraph 2, Line 1.

In order to conform to the SOW, the Remedial Action Work Plan should include a detailed description of the remediation and construction activities. The RA Work Plan should also include a project schedule for each major activity and submission of deliverables generated <u>during</u> the Remedial Action. The RA Work Plan shall meet all specifications cited in the UAO and SOW. However, if it makes sense to alter the SOW requirements then highlight and justify the change.

30. Page 3-2, Finalization of Project Plans, General.

According to the SOW, the finalization of the project plans cited

in this section was to occur at the time of the Final Design submittal. If it makes sense to finalize the project plans at a later time, highlight the departure from the SOW requirement and submit a schedule showing when these plans will be finalized.

31. Page 3-2, Startup and Proveout, lines 7 and 8.

In order to conform to the SOW, the text should be revised to state: "[t]he inspection is to determine whether the construction is complete and consistent with the contract documents and the Remedial Action."

32. Page 3-3, Operations and Maintenance Manual, General.

According to the SOW, the draft O & M plan was to be submitted as a prefinal and final document submission. Revise the text accordingly.

33. Page 3-3 and 3-4, Operations and Maintenance Manual, lines 4-6.

In order to conform to the SOW, the text should be revised as follows: "[t]he Final O&M Manual shall be submitted to EPA and the State prior to the pre-final construction inspection, in accordance with the approved construction schedule. The plan shall be composed of the following elements: "

34. Page 3-4, Operations and Maintenance Manual, item 4, line 4.

Revise the line to state, "and the environment or exceed performance standards, and... "

35. Page 3-5, Performance Standard Verification Plan, General.

In order to conform to the SOW, the following statement should be included: "[t]he purpose of the Performance Standard Verification Plan is to provide a mechanism to ensure that both short-term and long-term Performance Standards for the Remedial Action are met."

36. Page 3-5, Performance Standard Verification Plan, lines 6 and 7.

Based on the above, simply monitoring water levels and effluent chemistry will not meet the requirements of the SOW. Sampling of monitoring wells to determine that performance standards are being met, needs to be included in the plan.

37. Page 3-5, General.

Following the discussion on the Performance Standard Verification Plan and prior to the discussion on the Prefinal Inspection, a

summary of the contents of the supporting plans (i.e., QAPP, FSP, HASP, Contingency Plan and Construction Quality Assurance Plan) should be included. The contents of these supporting plans shall be verbatim those cited in pages 27-30 of the SOW.

38. Page 3-6, Final Construction Report, first paragraph, lines 4-6.

In order to conform to the SOW, the text should be revised to state: "[i]n the report, a registered professional engineer and the Respondent's Project Coordinator shall state that the construction has been completed in accordance with the design and specifications."

39. Page 3-6, Final Construction Report, first paragraph, lines 6-8.

In order to conform to the SOW, the text shall be revised to state the following, "The report shall contain the following statement, signed by a responsible corporate official of a Settling Defendant or the Respondent's Project Coordinator."

40. Page 3-6, Final Construction Report, second paragraph.

Correct typo: "through" should be "thorough".

41. Page 3-6, Paragraph 1 Lines 1-3, Completion of Remedial Action Report.

In order to conform to the SOW, the text shall be revised to state the following: "[t]he completion of remedial action report shall be submitted by the Respondents when construction is complete and performance standards have been attained and where O & M requirements will continue to be performed."

42. Page 4-1, Schedule.

The schedule must be provided in the Work Plan as is required by the UAO SOW. Since specific dates were not provided as required. The following dates must be inserted.

The 50% design report shall be submitted within 21 days of receipt of U.S. EPA's approval of the PGCS RD/RA Work Plan. The 100 % PGCS design submittal shall be submitted within 21 days of receipt of U.S. EPA's comments on the 50% PGCS design submittal. The construction schedule shall be established in the 100% PGCS design submittal and construction shall follow the approved schedule contained therein.

The Final Performance Standard Verification Plan, Final Construction Quality Assurance Plan, Final QAPP, Final HASP,

Final FSP and Final Contingency Plan shall be submitted within 21 days of receipt of U.S. EPA comments of the draft submittals.

43. Table 1.

The treatment system included in the ROD and SOW called for technologies involving air stripping, UV/oxidation, chemical precipitation and carbon absorption. These technologies were assembled to be operated as one system, so that the specific groundwater contaminants at the ACS site could be consistently treated below all expected effluent requirements. Table 1 does not provide a reasonable justification for the elimination of these proven technologies, and instead promotes the use of an innovative technology, biologically activated carbon (BAC). In order to justify the selection of the BAC technology, the U.S. EPA will require documentation which demonstrates that the BAC technology is capable of treating all contaminants below their effluent requirements on a consistent basis. Table 1 must be revised to include all of the technologies currently listed as usable in the ACS groundwater treatment train.

44. Table 2.

As previously discussed, include a footnote explaining the rationale for no quality assurance samples for the DQO Level III samples which were collected. In addition, the method for analyses must be identified as it is not sufficient to state SW-846. The Lab Parameters column refers to footnote number 7; however, no footnote number 7 was provided on the Table. Make the necessary corrections to the table.

45. Figure 1.

According to Figure 1, the monitoring wells and piezometers used for the measurement of water levels during the pump test will be: the pump test well, proposed piezometer, MW02, MW09, MW14, P33, and P38. However, this does not agree with the text presented in Appendix A, Section 1.1, Page 1, Paragraph 3, Lines 2-4. The figure or the text should be revised.

ENCLOSURE 2

Following are conditions and effluent limitations applicable relevant and appropriate for treated water discharged to adjacent wetlands from American Chemical Services, Inc., NPL Superfund Site, Griffith, Indiana.

GENERAL CONDITIONS

1. The BOD_5 may be no more than 30 mg/L.

2. The TSS may be no more than 30 mg/L.

3. The pH shall not be less than 6.0 nor greater than 9.0 based on standard units. The pH shall be monitored by a grab sample, once monthly.

4. The discharge shall not cause excessive foam in the receiving waters/areas. The discharge shall be essentially free of floating and settleable solids.

5. The discharge shall not contain oil or other substances in amounts sufficient to create a visible film or sheen on the receiving waters/areas.

6. The discharge shall be free of substances that are in amounts sufficient to be unsightly or deleterious or which produce color, odor, or other conditions in such a degree as to create a nuisance.

7. The discharge shall not contain any substance in any amount sufficient to be acutely toxic to, or to otherwise severely injure of kill aquatic life, other animals, plants, or humans.

8. The discharge shall not contain any substances or combination of substances in amounts that will cause or contribute to the growth of aquatic plants or algae to such degree as to create a nuisance, be unsightly or otherwise impair the designated use.

9. There shall be no debris discharge. Debris is defined as woody material such as bark, twigs, branches, heartwood or sapwood that will not pass through a 1.0 in diameter round opening and is present in the discharge from a wet storage facility.

Monitoring and Reporting

1. Specific sampling protocols will be developed in the Performance Standards Verification Plan developed in the Perimeter Groundwater Containment System (PGCS) Work Plan.

2. All water discharge limitations criteria (attached) shall be monitored in accordance with the following.

Analytes	Cumulative Time from Startup	Frequency
Flowrate and pH	-	Continuous
BOD and TSS	0 to 7 days	once per day
SVOCs,	8 to 30 days	once per week
and Metals	31 to 180 days	once per month
	181 days onward	4 times per year
VOCs	0 to 7 days	once per day
	8 to 30 days	once per week
	31 days onward	once per month
PCBs	0 to 7 days	once
	8 to 30 days	once
	31 to 180 days	twice
	181 days onward	twice per year

[This schedule may be modified upon approval by U.S. EPA]

3. PCBs in sediments shall be monitored in the discharge area of the wetlands on an annual basis.

4. Samples taken in compliance with these limitations shall be taken by a grab sample at a point representative of the discharge but prior to entry into the receiving waters/areas and must be representative of the volume and nature of the monitored discharge.

5. Compliance will be demonstrated if the observed effluent concentrations are less than the limit of quantitation (LOQ). If the measured effluent concentrations are above the limitations and above this limit of detection specified herein in any of three (3) consecutive analyses or any five (5) out of nine (9) analyses, changes must be instituted to assure compliance with the LOQ.

Effluent concentration less than the limit of quantitation shall be reported as the actual value. Effluent concentrations less than the limit of detection shall be reported on discharge monitoring report forms as less than the value of the limit of detection. For example, if a substance is not detected at a concentrations 0.01 mg/l, report the value as < 0.01 mg/l.

6. A case-specific method detection limit (MDL) or LOQ may be specified if approved by U.S. EPA/IDEM prior to use. Generally, the MDL shall be derived by the procedure specified for MDLs contained in 40 CFR 136, Appendix B, and the LOQ shall be set at 2.5 times the MDL. The MDL shall be set at 2 times the LOD. Other methods may be used if first approved by U.S. EPA/IDEM.

AMERICAN CHEMICAL SERVICES, INC., GRIFFITH, LAKE COUNTY, INDIANA
NPDES NUMBERS FOR DISCHARGE TO NO FLOW WETLANDS (revised 1/23/96)

Table 7: ROD	NPDES FINAL #	RATIONALE
benzene	5 ug/l	MCL
vinyl chloride	2 ug/l	MCL
PCB (total)	0.00056 ug/l (DL: 0.1 ug/l)*	IWQEL
bis (2-chloroethyl) ether	9.6 ug/l	IWQEL
arsenic	50 ug/l	MCL
tetrachlorethene	5.0 ug/l	MCL
methylene chloride	5 ug/l	MCL
trichloroethene	5 ug/l	MCL
bis (2-ethylhexyl) phthalate	6 ug/l	MCL
pentachlorophenol	1 ug/l	MCL
isophorone	50.0 ug/l	BAT/PA
2-butanone	210 ug/l	BAT/PA
4-methyl 2-pentanone	15 ug/l	BAT/PA
acetone (2-pentanone)	6800 ug/l	IWQEL
ethyl benzene	34 ug/l	IWQEL
1,2 dichloroethene (cis)	70 ug/l	MCL
4-methyl phenol	34 ug/l	IWQEL
cadmium	4.1 ug/l	IWQEL
mercury	0.02 ug/l **	IWQEL
selenium	8.2 ug/l	IWQEL
zinc	411 ug/l	IWQEL

MCL: Maximum Contaminant Level
IWQEL: Indiana Water Quality Effluent Limits
BAT/PA: Best Available Treatment established by Pennsylvania DER
* Each PCB has a detection limit of 0.1 ug/l
** Limit of Detection is 0.64 ug/l

MONTGOMERY WATSON

November 29, 1995

Ms. Sheri Bianchin
United States Environmental Protection Agency
Region V (HSR-6J)
77 West Jackson Blvd.
Chicago, IL 60604-3590

Project No.: 4077.0100

SUBJECT: Construction of a Building for the Groundwater Treatment System Building
American Chemical Service, Inc. Superfund Site
Griffith, Indiana

Dear Ms. Bianchin:

As we discussed in one of our recent meetings, Montgomery Watson is planning to begin construction of a prefabricated metal building to house the groundwater treatment system that will be installed at the American Chemical Service, Inc. (ACS) Site. The original plan was to locate the equipment within one of the existing ACS buildings, but there is not sufficient room to accomodate the proposed facilities. Consequently, a new building will need to be constructed at the site. As we discussed, the new building will be located directly west of ACS operation outside of the existing ACS fence. An access road between the building and Colfax Road will be constructed just north of the existing ACS fence. Construction of the access road will begin within the next few weeks with construction of the building beginning after the road is in place. Our goal is to have the building constructed this year so that installation of treatment can continue through the winter.

The purpose of this letter is to confirm our understanding that that no formal submittal to U.S EPA is required prior to construction of the building. If you concur with this understanding, please sign and return one copy of this letter for our files. Thank you for

1300 Walnut Street
Suite 210
Boulder, Colorado
80302

Tel: 303 938 3818
Fax: 303 939 0163

your attention to this matter. If you have any questions or concerns, please don't hesitate to contact me at (303) 938-8818

Sincerely,

MONTGOMERY WATSON

Joseph D. Adams Jr., P.E.
Vice President

I concur with your understanding as stated above.

Sheri Bianchin/U.S. EPA

cc: Holly Grejda/IDEM
Ron Frehner/CRA
Mark Travers/deMaximus
Ron Schlicher/SLC-1
Peter Vagt/CHI-1